

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

OLAPLEX, LLC and LIQWD, INC.,

Plaintiffs,

v.

SZ MEADOWS INC. and SOLOMON SILVESTEIN, both individually and d/b/a "LUXURY BEAUTY SPOT," KRISCO SALES LLC, HEALTHY AND BEAUTY MARKETING GROUP INC., LOKESH BHATIA, a/k/a "BOB KUMAR," and SHEENA BHATIA, all individually and d/b/a "101 BEAUTY STORE"; "JOHN DOES" 1-10; and UNKNOWN ENTITIES 1-10;

Defendants.

CASE NO. 7:19-cv-05179(NSR)(PED)

**FINAL JUDGMENT AND PERMANENT INJUNCTION UPON CONSENT**

AS TO DEFENDANTS SZ MEADOWS, INC. and SOLOMON SILVERSTEIN

Plaintiffs Olaplex, LLC and LIQWD, INC. (hereinafter collectively referred to as "Plaintiffs") and defendants SZ Meadows Inc. and Solomon Silverstein, both individually and d/b/a/ "Luxury Beauty Spot" (hereinafter collectively referred to as "SZ Defendants") having agreed that a Final Judgment and Permanent Injunction Upon Consent ("Final Judgment") should be entered between them and good cause appearing therefore:

1. Plaintiffs asserted this action for trademark counterfeiting, 15 U.S.C. § 1114; trademark infringement, 15 U.S.C. § 1114; unfair competition, false designation of origin and false description, 15 U.S.C. § 1125(a); trademark dilution, 15 U.S.C. § 1125(c); and breach of contract. The Court further has continuing jurisdiction to enforce the terms and provision of this Final Judgment.

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FILED: 1/10/2020

2. Plaintiff Olaplex, LLC is a corporation organized and existing under the laws of the state of California, having its principal place of business at 1482 E. Valley Rd., Suite #701, Santa Barbara, California 93108.

3. Plaintiff LIQWD, Inc. is a corporation organized and existing under the laws of the state of California, having its principal place of business at 1482 E. Valley Rd., Suite #701, Santa Barbara, California 93108.

4. Defendant SZ Meadows Inc. is a New York corporation with its principle place of business located at 3 Sasev Court, Unit 112, Monroe, NY 10950. SZ Meadows Inc. also does business as "Luxury Beauty Spot."

5. Defendant Solomon Silverstein is the President / Owner of SZ Meadows s

6. Plaintiff LIQWD, Inc. is the owner of the federally registered, including but not limited to: **OLAPLEX®** trademark under US Trademark Registration No. 4,553,436; No. 4,557,585 for **BOND MULTIPLIER®**; and No. 4,682,909 for **BOND PERFECTOR®** (collectively, the "Olaplex Trademarks").

7. SZ Defendants agree that the jurisdiction of this Court is retained for the purpose of making any further orders necessary or proper for the construction, implementation or modification of this Final Judgment, the enforcement and the punishment of any violations thereof.

**IT IS ORDERED, ADJUDGED AND DECREED**

8. The Final Judgment shall be binding upon and shall inure to the benefit of the parties and their respective heirs, successors and assigns, and acquiring companies.

9. SZ Defendants, their agents, servants, employees and all persons acting in concert and participation with them, and their successors and assigns, jointly and severally be and hereby are, permanent restrained and enjoined from:

- a) using any counterfeit or infringement of the Olaplex Trademarks to identify any goods not authorized by Plaintiffs;
- b) counterfeiting or infringing the Olaplex Trademarks by importing, manufacturing, distributing, selling, offering for sale, advertising, promoting, displaying any products bearing any simulation, reproduction, counterfeit, or copy of the Olaplex Trademarks;
- c) using any simulation, reproduction, counterfeit, or copy of the Olaplex Trademarks in connection with the importation, promotion, advertisement, display, sale, offering for sale, manufacture, production, circulation or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Plaintiffs, or to any goods sold, manufactured, sponsored or approved by, or connected with Plaintiffs;
- d) making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act, which can or is likely to lead the trade or public, or individual members thereof, to believe that any services provided, products manufactured, distributed, sold or offered for sale, or rented by SZ Defendants are in any way associated or connected with Plaintiffs;
- e) engaging in any other conduct constituting an infringement of the Olaplex Trademarks, of Plaintiffs' rights in, or to use or to exploit, said trademark, or constituting any weakening of Plaintiffs' names, reputation and goodwill; or
- f) making, importing, distributing, offering to sell, or selling any Olaplex product.

10. This Final Judgment shall be deemed served upon the SZ Defendants at the time of the execution by the Court.

11. This action against SZ Defendants is hereby dismissed with prejudice.

**CONSENTED TO BY THE PARTIES:**

The undersigned hereby consent to the entry of the Final Judgment in the form annexed hereto or in such other form as the Court may approve.

Dated: 12/24/2019, 2019

**OLAPLEX, LLC.**

DocuSigned by:  
By: Tiffany Walden  
Name: Tiffany Walden  
Title: Chief Administrative Officer  
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/ Chief Legal Officer

Dated: 12/24/2019, 2019

**LIQWD, INC.**

By: Tiffany Walden  
DocuSigned by:  
CF802F23F7BE4C2...

Name: Tiffany Walden  
Title: General Counsel/ VP /  
Corporate Secretary

Dated: \_\_\_\_\_, 2019

**SZ MEADOWS INC.**

By: Le C. M.

Name: Solomon Silvertsein  
Title: President

Dated: \_\_\_\_\_, 2019

**SOLOMON SILVERSTEIN**

By: Le C. M.

SO ORDERED:

Jan. 10, 2020  
White Plains, NY

  
\_\_\_\_\_  
Nelson S. Roman,  
United States District Court Judge